

Exhibit A

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkine,
Serve: Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant

Case No. _____

COMPLAINT FOR PRETRIAL ATTACHMENT

COMES NOW your Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., by counsel, and for its Complaint for Pretrial Attachment against the Defendant, Nikolai I. Sinkine, doth state and affirm as follows:

1. That your Plaintiff is a law firm doing business in the State of Virginia providing legal services, whose office is located in the City of Newport News, Virginia.
2. Bryan H. Schempf, Esquire, is a member and agent of Plaintiff corporation (hereinafter Schempf).
3. That Schempf, as agent for Plaintiff, was retained by Defendant on January 10, 2006 to represent Defendant in a suit for divorce.
4. Through an oversight an Engagement Letter was not executed by Defendant at the onset of Plaintiff's representation. Subsequently, on January 5, 2007 Defendant executed an Agreement acknowledging his indebtedness at that time to Plaintiff and Defendant agreed to the debt then existing and agreed that all debts for legal expenses and costs incurred were to be paid out of Defendant's share of the net equity from the sale of Defendant's marital home. A copy of the Agreement is attached hereto as Exhibit A.

5. Pursuant to Plaintiff's representation of Defendant in the divorce matter of *Nikolai I. Sinkine v. Tatyana A. Babakaeva*, Defendant incurred the total amount of \$31,408.88, due and payable to Plaintiff.
6. That the marital home was sold and generated proceeds in the amount of \$92,291.07 and is held in the escrow account of Paul H. Wilson, Esquire.
7. That your Plaintiff has a legal and/or equitable claim to the funds held in the trust account of Paul H. Wilson, Esquire.
8. That your Defendant is removing or about to remove the property sued for, or his own estate, or the proceeds of the sale of his property out of the Commonwealth of Virginia so that there will probably not be a sufficient remainder to satisfy the debt.
9. That the proceeds will be removed, secreted, or otherwise disposed of by the Defendant so as to prevent the satisfaction of the final judgment of the Court respecting said proceeds.

WHEREFORE, Plaintiff prays that a Pretrial Attachment be issued against the funds held in the trust account of Paul H. Wilson, Esquire, from the sale of Defendant's marital home in the amount of \$31,408.88 and for attorney fees and costs, and for such other remedies as this Court deems proper at law and equity.

Jones, Blechman, Woltz & Kelly, P.C.

By Raymond B. Bac
Of Counsel

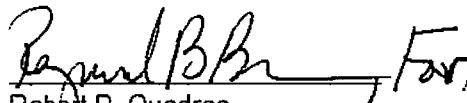
Robert P. Quadros, VSB #14402
Quadros & Associates, P.C
2715 Huntington Avenue
Newport News, VA 23607
(757)244-4711
#177594.001

CERTIFICATE OF SERVICE

I hereby certify that on the 23 day of June, 2008 a true and accurate copy of the foregoing pleading was mailed to:

Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant

A copy will also be served on the defendant via a private process server.


Robert P. Quadros

Jones, Blechman, Woltz & Kelly, P.C.

Attorneys and Counselors at Law

HERBERT V. KELLY
RAYMOND H. SUTTLE
B.M. MILLNER
RALPH M. GOLDSTEIN
JOHN T. TOMPKINS, III
CONWAY H. SHEILD, III
DAVID W. OTEY
HERBERT V. KELLY, JR.
RICHARD B. DONALDSON, JR.
DAVID W. OTEY, JR.
MICHAEL B. WARE
ROBYN HYLTON HANSEN
LEONARD C. HEATH, JR.
RAYMOND H. SUTTLE, JR.
BRYAN H. SCHEMPF
HELENA S. MOCK
J. VANCE STALLINGS
SUSAN E. LUSCOMB
MATTHEW D. MEADOWS

701 TOWN CENTER DRIVE, SUITE 800
POST OFFICE BOX 12888
NEWPORT NEWS, VIRGINIA 23612-2888
(757) 873-8000
FACSIMILE: (757) 873-8103

485 McLAWS CIRCLE
WILLIAMSBURG, VIRGINIA 23185
(757) 259-5700
FACSIMILE: (757) 259-5717

ALLAN D. JONES, 1875-1954
DANIEL SCHLISSER, 1915-1977
F.O. BLECHMAN, 1905-1986
ARTHUR W. WOLTZ, 1905-1993
THOMAS N. DOWNING, 1919-2001
SVEN J. LASSEN, 1947-2006

SHAWN W. OVERBEY
LAUREN C. BADDAR
REBECCA L. SHWAYDER-AMAN
JUSTIN M. SIZEMORE
JOSEPH F. VERSER

REPLY TO: Newport News

Direct Dial No. 873-8110

Internet E-Mail Address: bschempf@jwbk.com

January 5, 2007

VIA HAND DELIVERY

Nikolai Sinkine

RE: Nikolai I. Sinkine v. Tatyana A. Babakaeva
Chancery No.: CL06-00110-00, Part IV

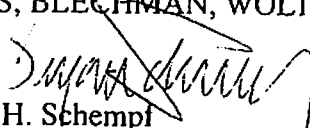
Dear Mr. Sinkine:

This confirms our previous discussions about payment of your existing and future legal expenses in connection with your pending divorce action. Until you recently refinanced the house, you had not been able to stay current on your legal expenses which, as of December 31, 2006, total the amount of \$9,840.40. I have agreed to remain as your counsel in this case on condition that this amount, plus any future legal expenses and costs incurred on your behalf, are paid from your share of the net equity in the marital residence.

By your signature at the bottom of this letter, you acknowledge that you are indebted to this firm in the present amount of \$9,840.40 and agree that this amount and any future amount for legal expenses and costs incurred on your behalf will be paid by the closing agent out your share of the net equity from the sale of your house. You further agree that this letter can be disclosed by me to the closing agent to ensure that the legal fees and costs are paid out of the disbursement.

Very truly yours,

JONES, BLECHMAN, WOLTZ & KELLY, P.C.


Bryan H. Schempf

BHS/nrm



Jones, Blechman, Woltz & Kelly, P.C.

Page 2

BHS/nrm

I certify that I have reviewed and understand the above letter and agree with the terms and conditions thereof.

Nikolai Sinkine
Nikolai I. Sinkine

Date: 01/05/2007

Subscribed and sworn to before me this 5th day of January, 2007.

Nadeya B. Meyer
Notary Public

My commission expires:

February 29, 2008

#395812/67526.001

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkine,
Defendant

:
:
:
:
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:
:

Case No. CL0801064-04

ORDER

On this day came Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., by counsel, to present evidence to the Court regarding the significant threat that the Defendant may attempt to obtain certain funds held in escrow and secret the funds so that a judgment in favor of Plaintiff on an underlying matter would go unsatisfied.

Upon careful consideration of the matter and documents presented, including evidence that Plaintiff has secured a Bond and said Bond is properly filed with the Court, it is hereby

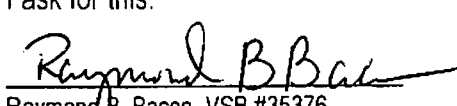
ORDERED, ADJUDGED and DECREED that a lien is placed on any funds held by the Law Offices of Wilson & Wilson, P.C. for the use and benefit of Nikolai I. Sinkine and that such funds not be disbursed to anyone without further order of this Court, and it is further

ORDERED, ADJUDGED and DECREED that within thirty days of the entry of this Order, Plaintiff shall set a hearing so that this Court may consider additional evidence and make additional rulings as required.

Entered this 16th day of July, 2008.


H. Vincent Conway, Jr., Judge

I ask for this:


Raymond B. Bacon, VSB #35376
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 223-2013
Counsel for Plaintiff
#177594.001

177594.001

ROBERT P. QUADROS
RAYMOND B. BACON

July 25, 2008

Rex A. Davis, Clerk
Newport News Circuit Court
2500 Washington Avenue
Newport News, VA 23607

RE: Jones, Blechman, Woltz & Kelly, PC v. Nikolai I. Sinkine
Case No. CL0801064V-04

Dear Mr. Davis:

With regard to the above matter enclosed please find a *Notice of Hearing*, which I respectfully request you file on behalf of the plaintiff to place this matter on the Court's docket for August 7, 2008 at 8:30 a.m.

I hereby certify by copy of this correspondence that I mailed a true and accurate copy of the *Notice of Hearing* this date to Nikolai I. Sinkine, defendant, at his last known address of 28 Kincaid Lane, Hampton, VA 23666, and to Paul H. Wilson, Esquire, Wilson & Wilson, PC, 744-A Thimble Shoals Boulevard, Newport News, VA 23606.

Thanking you in advance for your attention to this matter, I am

Very truly yours,

QUADROS & ASSOCIATES, P.C.

Robert P. Quadros

RPQ/sjp
Enclosure

cc: Jones, Blechman, Woltz & Kelly, PC
Nikolai I. Sinkine ✓
Paul H. Wilson, Esquire

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkine,
Defendant

Case No. CL0801064V-04

NOTICE OF HEARING

PLEASE TAKE NOTICE that on August 7, 2008 at 8:30 a.m. the undersigned, by counsel, will appear before the Honorable H. Vincent Conway, Jr., Judge of the Newport News Circuit Court, located at 2500 Washington Avenue, Courtroom #4, Newport News, VA, so that this Court may consider additional evidence and make additional rulings as required.

TAKE NOTICE AND GOVERN YOURSELF ACCORDINGLY.

Jones, Blechman, Woltz & Kelly, P.C.

By Raymond B. Bacon
Of Counsel

Raymond B. Bacon, VSB #35376
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 223-2013
#177594.001


CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of July, 2008 a true and accurate copy of the foregoing document was mailed to:

Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant

Paul H. Wilson, Esquire
Wilson & Wilson, PC
744-A Thimble Shoals Boulevard
Newport News, VA 23606

A copy will also be served on Paul H. Wilson, Esquire, via a private process server.



Raymond B. Bacon

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkine,
Defendant

Case No. CL0801064-04

ORDER

THIS MATTER CAME TO BE HEARD upon Plaintiff's Complaint for Pretrial Attachment, and,

This Court having heard from Bryan Schempf, and counsel for Bryan Schempf, with no appearance being made by any other party, and,

Upon consideration of the testimony and other evidence presented, it is hereby


ORDERED, ADJUDGED and DECREED that Paul H. Wilson remit to the Clerk of the Circuit Court of Newport News, Virginia all of the funds that he holds in escrow and is the subject of this Court's previous Order entered on July 16, 2008 in this matter until further Motions are made or other Orders are entered in this matter.

It is further **ORDERED, ADJUDGED and DECREED** that the Clerk of this Court not release any portion of the funds without further Order of this Court.

Entered this 18th day of August, 2008.


H. Vincent Conway, Jr., Judge

I ask for this:


Raymond B. Bacon, VSB #35376
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 223-2013
Counsel for Plaintiff
#177594.001

I certify that the documents to which this authentication is affixed are true copies of a record in the Newport News Circuit Court, that I have custody of the record and that I am the custodian of that record.

Rex A. Davis, Clerk

By  D.C.

Exhibit A2

(757) 244-4611
FAX (757) 244-4631ROBERT P. QUADROS
RAYMOND B. BACON

September 10, 2008

C
O
P
Y

Rex A. Davis, Clerk
Newport News Circuit Court
2500 Washington Avenue
Newport News, VA 23607RE: Jones, Blechman, Woltz & Kelly, P.C. v. Nikolai I. Sinkine
Case No. CL0801064-04
Our File No. 177594.001

Dear Mr. Davis:

This letter is written in regard to the matter referenced above. Enclosed please find a *Motion to Amend Order*, which I respectfully request you file on behalf of the plaintiff.

I hereby certify that by copy of this correspondence I have mailed a copy of the enclosed pleading to Nikolai I. Sinkine, defendant.

Thanking you in advance for your assistance in this matter, I am

Very truly yours,

Quadros & Associates, P.C.

Raymond B. Bacon

RBB/sjp
Enclosurecc: Jones, Blechman, Woltz & Kelly, P.C.
Nikolai I. Sinkine ✓
Paul Wilson, Esquire

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkine,
Defendant

Case No. CL0801064-04


MOTION TO AMEND ORDER

COMES NOW your Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., by counsel, and for its Motion to Amend Order doth state and affirm as follows:

1. That Your Honor entered an Order on August 18, 2008 that requires Paul Wilson to remit to the Clerk's Office of this Court all of the funds held in escrow in this matter.
2. That it is the understanding of counsel for Plaintiff that this Court's Order would cause Paul Wilson to violate an Order of the Circuit Court of Hampton, Virginia.
3. That it appears that this Court would maintain full jurisdiction of the funds while abating any conflicts that Paul Wilson may suffer.

WHEREFORE, Plaintiff prays that this Court amend its previous Order to instruct Paul Wilson to hold the funds until further Order of this Court or the Circuit Court of Hampton, Virginia.

Jones, Blechman, Woltz & Kelly, P.C.

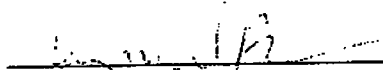
By: 
Of Counsel

Raymond B. Bacon, VSB #35376
Quadros & Associates, PC
2715 Huntington Avenue
Newport News, VA 23607
(757) 223-2013
#177594.001

CERTIFICATE OF SERVICE

I hereby certify that on the 10 day of September, 2008 a true and accurate copy of the foregoing pleading was mailed to:

Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant


Of Counsel

ROBERT P. QUADROS

RAYMOND B. BACON

October 8, 2008

Rex A. Davis, Clerk
Newport News Circuit Court
2500 Washington Avenue
Newport News, VA 23607

RE: Jones, Blechman, Woltz & Kelly, PC v. Nikolai I. Sinkine
Case No. CL0801064V-04
Our File No. 177594.001

Dear Mr. Davis:

With regard to the above matter enclosed please find a *Notice of Hearing*, which I respectfully request you file on behalf of the plaintiff to place this matter on the Court's docket for November 17, 2008 at 8:30 a.m.

I hereby certify by copy of this correspondence that I mailed a true and accurate copy of the *Notice of Hearing* this date to Nikolai I. Sinkine, defendant, at his last known address of 28 Kincaid Lane, Hampton, VA 23666, and to Paul H. Wilson, Esquire, Wilson & Wilson, PC, 744-A Thimble Shoals Boulevard, Newport News, VA 23606.

Thanking you in advance for your attention to this matter, I am

Very truly yours,

QUADROS & ASSOCIATES, P.C.


Raymond B. Bacon

RBB/sjp
Enclosure

cc: Jones, Blechman, Woltz & Kelly, PC
Nikolai I. Sinkine
Paul H. Wilson, Esquire

2008 OCT -8 PM 2:50
CIRCUIT CT. CLK. OFFICE
CITY OF NEWPORT NEWS, VA
REX A. DAVIS
CLERK

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkins,
Defendant

Case No. CL0801064-04

NOTICE OF HEARING

PLEASE TAKE NOTICE that on November 17, 2008 at 8:30 a.m. the undersigned, by counsel, will appear before the Honorable H. Vincent Conway, Jr., Judge of the Newport News Circuit Court, located at 2500 Washington Avenue, Courtroom # 4, Newport News, Virginia pursuant to its *Motion to Amend Order*.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Jones, Blechman, Woltz & Kelly, P.C.

By: Raymond B. Bacon
Of Counsel

Robert P. Quadros, VSB #14402
Raymond B. Bacon, VSB #35376
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 244-4611
#177594.001

FILED
2008 OCT -8 PM 2:50
CIRCUIT CLERK
CITY OF NEWPORT NEWS, VA
REX A. DAVIS
CLERK

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of October, 2008 I mailed a true and accurate copy of the foregoing Notice of Hearing to:

Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant

Raymond B. Bacon
Raymond B. Bacon,

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

JONES, BLECHMAN, WOLTZ & KELLY)

Plaintiff)

vs.)

NIKOLAI I. SINKINE,)

Defendant)

Case No.: CL0801064V-04

ORDER

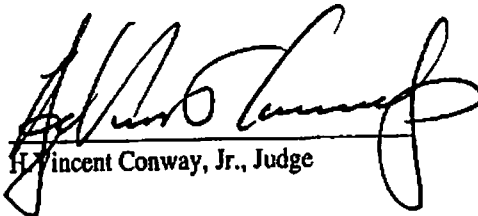
On this 17th day of November, 2008, came Plaintiff Jones, Blechman, Woltz & Kelly, by counsel, and Intervenor Tatyana A. Babakaeva, *pro se*, and Intervenor's motion for leave to intervene as Codefendant in the above-style captioned action, and said motion was argued by Intervenor and counsel.

UPON CONSIDERATION WHEREOF, it appearing to the Court that failure to admit Intervenor Tatyana Babakaeva as Codefendant might expose said Tatyana A. Babakeva to the risk of jeopardizing her title to and interest in the property subject to this matter, it is therefore

ADJUDGED, OREDERED and DECREED, that leave be and hereby granted to Tatyana A. Babakaeva to intervene in this action in accordance with the aforementioned motion, and this action shall proceed with Tatyana Babakaeva as party Codefendant.

Entered this 17th day of November, 2008.

I certify that the documents to which this authentication is affixed are true copies of a record in the Newport News Circuit Court, that I have custody of the record and that I am the custodian of that record.


Vincent Conway, Jr., Judge

Rex A. Davis, Clerk

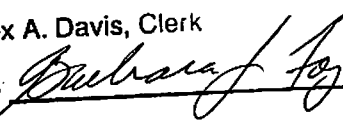
By  D.C.

Exhibit A3

I ASK FOR THIS:

Tatyana A. Babakaeva, pro se

Tatyana A. Babakaeva, pro se

2124 Criston Dr.

Newport News, VA 23602

SEEN:

Raymond B. Bacon

Raymond B. Bacon, VSB #35376

Quadros & Associates, P.C.

2715 Huntington Avenue

Newport News, VA 23607

(757)223-2013

Counsel for Plaintiff

#177594.001